

# SUMMARY AUDIT REPORT

## Operation General Information

Name of Cyanide Transportation Facility: PT Anggaraksa Internasional Multimoda

Name of Facility Owner: Lida Sari Ramadhani

Name of Responsible Manager: Nanang Heryana

Address: Jl. RS. Fatmawati No. 8 Gandaria Selatan, Jakarta Selatan

State/Province: Jakarta

Country: Indonesia

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## Operation Location Detail and Description

Transportation of solid sodium cyanide from International Port of Surabaya (Terminal Petikemas Surabaya), Indonesia by road to Port Perak (Domestic Port of Surabaya), Indonesia by PT Hacaca Setio Abadi. Sea transportation from Port of Perak to Port of Bitung, Indonesia by PT Tanto Intim Line. Road transportation from Port of Bitung interim storage (Terminal Petikemas Bitung) to mine sites by PT Anggaraksa Internasional Multimoda [PT AIM] own transportation to gold mine sites located in Bakan Atas (JResources) and Tokatindung (MSM/TTN).

Name of Operation: PT AIM

*Danny Jan*

Date: 8 Dec 2025

Signature of Lead Auditor  
& Technical Expert

# SUMMARY AUDIT REPORT

## *Auditor's Finding*

This operation is

- in full compliance
- in substantial compliance \*(see below)
- not in compliance

with the International Cyanide Management Code.

## **Auditor Information**

Audit Company: Danny Tan

Lead Auditor: Danny Tan

Lead Auditor Email: dannytan163@yahoo.com.sg

Dates of Audit: 23 to 25 Sep 2025

## **Auditor Attestation**

I attest that I meet the criteria for knowledge, experience and conflict of interest for a Cyanide Code Certification Audit Lead Auditor, established by the International Cyanide Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code Certification Auditors.

I attest that this Summary Audit Report accurately describes the findings of the certification audit. I further attest that the certification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Cyanide Transportation Verification Protocol and using standard and accepted practices for health, safety and environmental audits.

PT AIM

*Danny Tan*

8 Dec 2025

Name of Operation

Signature of Lead Auditor

Date

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# SUMMARY AUDIT REPORT

## Principles and Standards of Practice

### Principle 1 | TRANSPORT

Transport cyanide in a manner that minimizes the potential for accidents and releases.

Standard of Practice 1.1:

*Select cyanide transport routes to minimize the potential for accidents and releases.*

in full compliance with

The operation is  in substantial compliance with Standard of Practice 1.1

not in compliance with

*Summarize the basis for this Finding/Deficiencies Identified:*

PT AIM established procedure [SOP – CMS-01 Route Selection and Risk Assessment dated 29 Sep 2025] for selecting cyanide transport routes that aim to minimize the potential for accidents, releases, or their impacts. The current approach adequately considers key risk factors such as:

- a) Population density, including sensitive sites such as schools;
- b) Infrastructure condition and design, such as the construction quality of roads and the presence of narrow lanes used for convoy movements and motorcyclists;
- c) Topography, including steep pitches and descending grades that may increase the risk of vehicle instability; and
- d) Environmental considerations, including the proximity of water bodies (e.g., rivers) and the prevalence of poor visibility – no lighting along transport routes.

PT AIM implements a process or procedure to reevaluate routes used for cyanide deliveries periodically and a method for getting feedback on route conditions from the transporter's operators. Documented the measures taken to address risks identified with the selected routes as reflected in Hazard Identification Risk Assessment Determining Control dated 1 Oct 2025 [Tokatindung] and [Bakan]

PT AIM seeks input from communities, other stakeholders, and applicable governmental agencies [such as Police, Fire Brigade/ Search and Rescue, and Ambulance in the selection of routes and development of risk management measures. Engages convoys and police escorts as part of overall safety or security measures during transportation.

PT AIM contracts PT Hacaca Setio Abadi to transport cyanide by road from the Port of Surabaya (Terminal Petikemas Surabaya) to Port Perak (Domestic Port of Surabaya), Indonesia. Procedure in place to inform the contractor (Due Diligence Investigation – SOP/CMS/08 dated 29 Sep 2025) of the applicable International Cyanide Management Code requirements, to ensure that the contractor complies with the requirements of Transport Practice 1.1.

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Standard of Practice 1.2:

*Ensure that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.*

in full compliance with

The operation is  in substantial compliance with Standard of Practice 1.2

not in compliance with

*Summarize the basis for this Finding/Deficiencies Identified:*

PT AIM has a defined selection criterion and a formal training plan [SOP – CMS-02 Training & Qualification, dated 29 Sep 2025] to ensure that all personnel operating cyanide-handling and transport equipment are adequately trained. As a result, there is no assurance that these individuals can perform their duties in a manner that minimizes the potential for cyanide releases and human exposure.

PT AIM contracts PT Hacaca Setio Abadi to transport cyanide by road from the Port of Surabaya (Terminal Petikemas Surabaya) to Port Perak (Domestic Port of Surabaya), Indonesia. Procedure in place to inform the contractor (Due Diligence Investigation – SOP/CMS/08 dated 29 Sep 2025) of the applicable International Cyanide Management Code requirements, to ensure that the contractor complies with the requirements of Transport Practice 1.2.

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Standard of Practice 1.3:

*Ensure that transport equipment is suitable for the cyanide shipment.*

in full compliance with

The operation is  in substantial compliance with Standard of Practice 1.3

not in compliance with

*Summarize the basis for this Finding/Deficiencies Identified:*

PT AIM does have a procedure [Maintenance truck & Trailer - SOP/CM/03, dated 29 Sep 2025] in place to ensure the use of equipment designed and maintained to operate within the loads it will handle.

PT AIM has a procedure for preventing the overloading of transport vehicles used to handle cyanide. All cyanide-related transport equipment, including trucks, trailers, escort vehicles, and stackers, must be included in the Preventive Maintenance Programme (PMP). The PMP ensures that equipment is regularly inspected and monitored so that wear, malfunction, or deterioration is detected early, thereby preventing conditions that could lead to vehicle overloading during cyanide transport.

PT AIM contracts PT Hacaca Setio Abadi to transport cyanide by road from the Port of Surabaya (Terminal Petikemas Surabaya) to Port Perak (Domestic Port of Surabaya), Indonesia. Procedure in place to inform the contractor (Due Diligence Investigation – SOP/CMS/08 dated 29 Sep 2025) of the applicable International Cyanide Management Code requirements, to ensure that the contractor complies with the requirements of Transport Practice 1.3.

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## Standard of Practice 1.4:

*Develop and implement a safety program for transport of cyanide.*

in full compliance with

The operation is  in substantial compliance with Standard of Practice 1.4

not in compliance with

## *Summarize the basis for this Finding/Deficiencies Identified:*

PT AIM does have a procedure in place [SOP – CMS-04 Inventory Control dated 29 Sep 2025] to ensure that cyanide is transported in a manner that maintains the integrity of the producer's original packaging.

PT AIM has a comprehensive safety program in place for cyanide transport that addresses critical elements necessary to ensure safe handling and minimize the risk of incidents.

Specifically, the current operations included the following:

- a) Vehicle inspections before each departure or shipment.
- b) A preventive maintenance program to ensure vehicle reliability and safety;
- c) Limitations on the operator or driver working hours to prevent fatigue-related accidents [SOP/CMS/13 – Fatigue Management Procedure dated 29 Sep 2025]
- d) Procedures to prevent cargo loads from shifting during transit.
- e) Contingency procedures for modifying suspending transport operations in response to adverse conditions such as severe weather or civil unrest.
- f) Drug and alcohol abuse prevention program for drivers and relevant personnel;
- g) A system for retaining records that document the implementation of the above safety measures.

PT AIM contracts PT Hacaca Setio Abadi to transport cyanide by road from the Port of Surabaya (Terminal Petikemas Surabaya) to Port Perak (Domestic Port of Surabaya), Indonesia. Procedure in place to inform the contractor (Due Diligence Investigation – SOP/CMS/08 dated 29 Sep 2025) of the applicable International Cyanide Management Code requirements, to ensure that the contractor complies with the requirements of Transport Practice 1.4.

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Standard of Practice 1.5:

*Follow international standards for transportation of cyanide by sea.*

in full compliance with

The operation is  in substantial compliance with Standard of Practice 1.5

not in compliance with

*Summarize the basis for this Finding/Deficiencies Identified:*

PT AIM subcontracts PT Tanto Intim Line to provide commercial vessel services for transporting cyanide from TPS to the Port of Bitung. The shipping records reviewed showed that all cyanide dangerous goods shipments complied with the IMDG Code. The cyanide was packaged in accordance with Part 4 requirements, and sections 5.2.1 and 5.2.2 were not applicable because the material was shipped in IBCs within general-purpose containers. Documentation showed correct placarding and marking under Chapter 5.3, and the DG transport documents met the requirements of Chapter 5.4, with Section 5.4.2 excluded since the producer handles packaging and no empty tank containers are shipped. Vessel manifests accurately identified the cyanide containers and their stowage locations in line with Section 5.4.3.1, and the vessel in use maintained an appropriate Emergency Response Plan.

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## Standard of Practice 1.6:

*Track cyanide shipments to prevent losses during transport.*

in full compliance with

The operation is  in substantial compliance with Standard of Practice 1.6

not in compliance with

*Summarize the basis for this Finding/Deficiencies Identified:*

PT AIM has a procedure as reflected in SOP-CMS-09 - Tracking and Communication dated 29 Sep 2025, that indicates the means to communicate with the transport company, the mining operation, the cyanide producer or distributor, and/or emergency responders and communication equipment (GPS, mobile phone, radio, pager, etc.) periodically tested to ensure it functions properly. There is identification of communication blackout areas along transport routes and special procedures implemented for the blackout areas [SOP-CMS-09 - Tracking and Communication dated 29 Sep 2025]

PT AIM has adequate systems and procedures in place to track the progress of cyanide shipments, including active monitoring during transit. Process and procedures in place for inventory control and/or chain-of-custody documentation to prevent the loss of cyanide during shipment. Process to ensure that shipping records accurately indicating the amount of cyanide in transit, along with the corresponding Material Safety Data Sheets (MSDS), are available and accompany the shipment during transport.

PT AIM contracts PT Hacaca Setio Abadi to transport cyanide by road from the Port of Surabaya (Terminal Petikemas Surabaya) to Port Perak (Domestic Port of Surabaya), Indonesia. Procedure in place to inform the contractor (Due Diligence Investigation – SOP/CMS/08 dated 29 Sep 2025) of the applicable International Cyanide Management Code requirements, to ensure that the contractor complies with the requirements of Transport Practice 1.6.

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## Principle 2 | INTERIM STORAGE

### Design, construct and operate cyanide interim storage sites to prevent releases and exposures.

#### Standard of Practice 2.1:

Store cyanide in a manner that minimizes the potential for accidental releases.

in full compliance with

The operation is  in substantial compliance with Standard of Practice 2.1

not in compliance with

#### Summarize the basis for this Finding/Deficiencies Identified:

PT AIM In accordance with SOP CMS-10 Interim Storage, dated 29 September 2025, the Company ensures adherence to the following requirements:

1. **Warning Signage:** Appropriate warning signs are posted to alert personnel that cyanide is present, that smoking, open flames, eating, and drinking are prohibited, and to indicate the required personal protective equipment (PPE).
2. **Security Measures:** Adequate security controls are implemented to prevent unauthorized access to cyanide, including lockouts on valves and secured, fenced, and locked storage areas for solid cyanide.
3. **Segregation of Incompatible Materials:** Cyanide is stored separately from incompatible substances such as acids, strong oxidizers, and explosives. Physical barriers such as berms, bunds, or walls are utilized to prevent potential mixing.
4. **Protection from Water Contact:** Solid cyanide is stored in a manner that minimizes the potential for contact with water, such as under roofed structures, above ground level, or within specially designed containers.
5. **Ventilation:** Storage areas are equipped with adequate ventilation systems to prevent the accumulation of hydrogen cyanide gas.

PT AIM utilizes the Port of Bitung for interim storage, ensuring, through the Port Management Commitment as stipulated in SOP CMS-10 Interim Storage dated 29 September 2025, that the Port of Bitung maintains adequate systems and equipment to contain any potential cyanide spills effectively and to minimize the extent of any release during transport operations.

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## Principle 3 | EMERGENCY RESPONSE

**Protect communities and the environment through the development of emergency response strategies and capabilities.**

Standard of Practice 3.1:

*Prepare detailed emergency response plans for potential cyanide releases.*

in full compliance with

The operation is  in substantial compliance with Standard of Practice 3.1

not in compliance with

*Summarize the basis for this Finding/Deficiencies Identified:*

PT AIM In accordance with SOP CMS-11 Emergency Response Plan, dated 29 September 2025, the Company ensures the following requirements are implemented and maintained:

1. **Emergency Response Plan Availability:**  
The transporter maintains a documented Emergency Response Plan (ERP).
2. **Plan Appropriateness:**  
The Emergency Response Plan is verified to be suitable for:
  - a) The designated transportation route;
  - b) The physical and chemical form of the cyanide being transported;
  - c) The method of transport utilized;
  - d) The condition and characteristics of the transport infrastructure (such as storage, roads and ports); and
  - e) The design of the transport vehicle and/or interim storage facility.
3. **Response Actions:**  
The plan includes detailed descriptions of appropriate response actions for potential emergency scenarios.
4. **External Entities and Coordination:**  
The plan identifies external entities with designated emergency response roles, including emergency responders, medical services, and local communities. It also defines their respective responsibilities and confirms that these entities have been formally notified of their roles.
5. **Integration with External Responders:**  
The plan clearly outlines the roles and coordination mechanisms for external responders, medical facilities, and community

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## Standard of Practice 3.2:

*Designate appropriate response personnel and commit necessary resources for emergency response.*

in full compliance with

The operation is  in substantial compliance with Standard of Practice 3.2

not in compliance with

*Summarize the basis for this Finding/Deficiencies Identified:*

In accordance with the Cyanide Transport Emergency Response Plan (ERP) – SOP/CMS/11, dated 29 September 2025, PT AIM has established processes to designate appropriate response personnel and allocate the necessary resources to ensure effective emergency response. The following requirements are addressed:

1. Emergency Response Training:  
The transporter provides emergency response training to designated and appropriately qualified personnel.
2. Roles and Responsibilities:  
The Emergency Response Plan clearly defines the specific duties and responsibilities of personnel involved in emergency response activities.
3. Emergency Equipment Inventory:  
A comprehensive list of all required emergency response equipment is maintained, covering equipment to be available during transport and along the transportation route.
4. Availability of Equipment and PPE:  
The transporter ensures that all necessary emergency response and health and safety equipment, including personal protective equipment (PPE), are available and accessible during transport operations.
5. Inspection and Readiness:  
Procedures are in place to inspect, maintain, and verify the readiness of emergency response equipment to ensure its availability and functionality when required.

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## Standard of Practice 3.3:

*Develop procedures for internal and external emergency notification and reporting.*

in full compliance with

The operation is  in substantial compliance with Standard of Practice 3.3

not in compliance with

*Summarize the basis for this Finding/Deficiencies Identified:*

In accordance with the Cyanide Transport Emergency Response Plan (ERP) – SOP/CMS/11, dated 29 Sep 2025, PT AIM has established procedures and systems to ensure effective emergency communication and regulatory reporting as outlined below:

**1. Emergency Notification Procedures:**

Procedures are in place, including current contact information, to ensure timely notification of the shipper, receiver/consignee, relevant regulatory agencies, external response providers, medical facilities, and potentially affected communities in the event of an emergency.

**2. Maintenance of Notification Systems:**

Systems have been established to ensure that both internal and external emergency notification and reporting procedures, along with associated contact details, are regularly reviewed and updated to maintain accuracy and effectiveness.

**3. ICMI Incident Notification:**

A documented procedure exists for notifying the International Cyanide Management Institute (ICMI) of any significant cyanide-related incidents. The Company also maintains records confirming whether any such incidents have occurred since the previous audit period.

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## Standard of Practice 3.4:

*Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.*

- in full compliance with
- The operation is  in substantial compliance with Standard of Practice 3.4
- not in compliance with

## *Summarize the basis for this Finding/Deficiencies Identified:*

In accordance with the Cyanide Transport Emergency Response Plan (ERP) – SOP/CMS/11, dated 29 September 2025, PT AIM has established procedures and systems to ensure effective remediation and environmentally responsible management of cyanide-related incidents, as outlined below:

**1. Remediation and Clean-up Procedures:**

Procedures are in place for the remediation of cyanide spills, including the recovery or neutralization of cyanide solutions or solids, decontamination of affected soils or other contaminated media, and the proper management and/or disposal of spill clean-up debris in accordance with regulatory and company requirements.

**2. Prohibition of Inappropriate Treatment Chemicals:**

The procedure explicitly prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate, and hydrogen peroxide for treating cyanide released into surface water, to prevent the formation of toxic by-products and ensure compliance with environmental standards.

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Standard of Practice 3.5: Periodically evaluate response procedures and capabilities and revise them as needed.

in full compliance with

The operation is  in substantial compliance with Standard of Practice 3.5

not in compliance with

*Summarize the basis for this Finding/Deficiencies Identified:*

In accordance with the Cyanide Transport Emergency Response Plan (ERP) – SOP/CMS/11, dated 29 September 2025, PT AIM has established and implemented processes to ensure the continuous evaluation and improvement of the Emergency Response Plan, as outlined below:

1. **Periodic Review and Evaluation:**

The ERP includes provisions for the periodic review and assessment of its adequacy to ensure continued relevance, effectiveness, and alignment with operational and regulatory requirements. These reviews are formally implemented and documented.

2. **Emergency Response Drills:**

The ERP provides for the periodic conduct of emergency response simulation drills designed to test specific aspects of the plan. It also outlines the conduct of full-scale incident scenarios involving coordination with external agencies such as the client mine site, police, fire services, and local medical facilities to evaluate overall emergency preparedness.

3. **Post-Drill Evaluation and Continuous Improvement:**

The ERP establishes a procedure for conducting debriefing sessions following emergency response drills or actual incidents to identify, analyze, and document lessons learned. **Documentation and Implementation:**

A schedule of planned emergency response simulation drills is included in the ERP appendices, demonstrating the Company's intent and commitment to preparedness, competency development, and continual improvement.

PT AIM conducted emergency response drills on 15 and 28 November 2025 to assess the effectiveness of the Emergency Response Plan (ERP). The exercises identified several lessons, including the need to strengthen initial response actions and enhance the readiness and availability of emergency equipment.

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